

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

AMY LANGFORD as the administrator)
of the ESTATE OF WYATT E.)
LANGFORD and AMY LANGFORD,)
Individually)

Plaintiff,)

v.)

CIVIL ACTION NO. _____

JPMORGAN CHASE BANK, MCCALLA)
RAYMER, LLC, FEDERAL HOME)
LOAN MORTGAGE CORPORATION)

Defendants.)
_____)

NOTICE OF REMOVAL

Defendant Federal Home Loan Mortgage Corporation (“Freddie Mac”) hereby files this Notice of Removal pursuant to 28 U.S.C. §§ 1442, 1446, and 12 U.S.C. § 1452(f). In support of this Notice, Freddie Mac states as follows:

PROCEDURAL BACKGROUND AND PREREQUISITES

1. Plaintiffs commenced a civil action against Freddie Mac on or about December 21, 2012, in the Superior Court of Murray County, State of Georgia, Civil Action File No. 12-CI-819-M (the “State Court Action”).

2. This Notice of Removal is timely under 28 U.S.C. § 1446(b) because Freddie Mac has not been properly served with the complaint or a summons in the State Court Action.

3. Although Freddie Mac has not been served, out of an abundance of caution, all documents filed in the State Court Action are attached hereto as Composite Exhibit A as required by 28 U.S.C. § 1446.

4. A removal notice and a copy of the instant Notice of Removal shall be filed with the Clerk of the Superior Court of Murray County, State of Georgia, and shall be served on Plaintiffs. A true and correct copy of the removal notice filed with the Clerk of the Superior Court of Murray County, State of Georgia is attached hereto as Exhibit B.

5. Freddie Mac is a United States corporation chartered by an Act of Congress organized and existing under the Federal Home Loan Mortgage Corporation Act, 12 U.S.C. § 1451, *et seq.*, with its principal place of business located in McLean, Virginia.

6. The Act provides that Freddie Mac “shall be deemed to be an agency included in sections 1345 and 1442 of such Title 28.” 12 U.S.C. § 1452(f).

7. Section 1452(f) of Title 12 further provides, in pertinent part, that any civil action in a state court to which Freddie Mac is a party may, at any time before

trial, be removed to the United States District Court embracing the place where the action is pending.

8. 28 U.S.C. § 1442(a) does not require Freddie Mac to notify or obtain the consent of any other defendant in this action in order to remove the entire case to federal court. *See* 28 U.S.C. 1442(a); *Federal Home Loan Mortg. Corp. v. Crittenden*, No. 2:11-CV-729-MHT, 2012 WL 6725636 at *1 (M.D. Ala. October 26, 2012) citing *Durham v. Lockheed Martin Corp.*, 445 F.3d 1247, 1253 (9th Cir. 2006).

9. Removal to this Court is proper pursuant to 28 U.S.C. §§ 1442 and 1446 because the State Court Action is currently pending in this Judicial District.

WHEREFORE, for the foregoing reasons, this Court has original jurisdiction of this matter pursuant to 12 U.S.C. § 1452(f), and removal of the action to this Court is proper pursuant to 28 U.S.C. § 1442. Accordingly, Freddie Mac respectfully requests this action proceed in this Court.

Respectfully submitted this 22nd day of January, 2013.

WARGO & FRENCH, LLP



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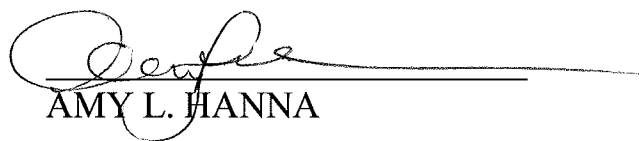
(404) 853-1501 (facsimile)

*Attorneys for Defendants JPMorgan Chase
Bank, N.A. and Federal Home Loan
Mortgage Corporation*

RULE 7.1(D) CERTIFICATE

The undersigned counsel certifies that this document has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(B).

Respectfully submitted this 22nd day of January, 2013.


AMY L. HANNA

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CERTIFICATE OF SERVICE

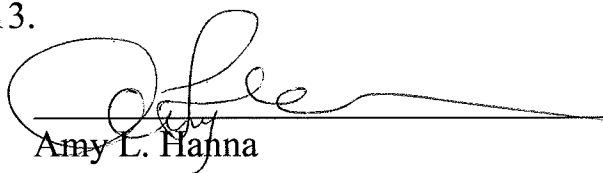
I hereby certify that I have on this day filed a true copy of the foregoing **NOTICE OF REMOVAL OF ACTION** in the United States District Court for the Northern District of Georgia and have served a true copy of same upon Plaintiffs, through their counsel, by United States mail, postage prepaid, addressed as follows:

W. Anthony Collins, Jr., Esq.
Smith Collins, LLC
8565 Dunwoody Place
Building 15, Suite B
Atlanta, GA 30350

(continued)

Steven Flynn, Esq.
McCalla Raymer, LLC
Six Concourse Parkway
Suite 2800
Atlanta, GA 30328

This 22nd day of January, 2013.



Amy L. Hanna